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[Proposed] Counsel to the Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

INTERNATIONAL LONGSHORE
AND WAREHOUSE UNION,

Debtor.

Case No. 23-30662-HLB

Chapter 11

**APPLICATION OF THE DEBTOR FOR
ORDER APPROVING DESIGNATION OF
WILLIAM E. ADAMS AS RESPONSIBLE
INDIVIDUAL PURSUANT TO LOCAL
RULE 4002-1**

[No Hearing Requested]

Pursuant to Rule 4002-1 of the Bankruptcy Local Rules for the Northern District of California (the “Local Rules”), the International Longshore and Warehouse Union (“ILWU” or “Debtor”), the debtor and debtor in possession in the above captioned chapter 11 case (the “Chapter 11 Case”), hereby applies (the “Application”) for the entry of an order approving the designation of William E. Adams, the President of ILWU, as its designated responsible individual during the Chapter 11 Case. In support of this Application, the Debtor respectfully represents as follows:

1. On September 30, 2023, the Debtor filed a voluntary petition for relief under subchapter V of chapter 11 of Title 11 of the United States Code.

2. The Debtor is organized under the laws of the State of California as a labor organization.

3. William E. Adams, the President of ILWU, is authorized to act on behalf of the Debtor in all matters relating to the Chapter 11 Case.

1 4. By this Application, the Debtor seeks to approve the appointment of William E. Adams
2 as the designated individual with primary responsibility for the duties and obligations of the Debtor.

3 5. Mr. Adams' contact information is:

4 William E. Adams
5 1188 Franklin Street, 4th Floor
6 San Francisco, CA 94109
7 Telephone: (415) 775-0533
8 Email: president@ilwu.org

9 **WHEREFORE**, the Debtor respectfully requests that this Court enter an order designating
10 William E. Adams, the President of the ILWU, as the natural person to be responsible for the duties
11 and obligations of the Debtor during the Chapter 11 Case. A proposed form of order is attached hereto
12 as Exhibit A.

13 Dated: October 1, 2023

PACHULSKI STANG ZIEHL & JONES LLP

14 /s/ Debra I. Grassgreen

15 Debra I. Grassgreen
16 Jason H. Rosell

17 *[Proposed] Counsel to the Debtor*
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EXHIBIT A

Proposed Order

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The Court having considered the *Application of the Debtor for Order Approving Designation of William E. Adams as Responsible Individual Pursuant to Local Rule 4002-1* [Docket No. •] (the “Application”) and finding that good cause exists for the relief requested,

IT IS HEREBY ORDERED THAT:

1. The Application is **GRANTED**.
2. William E. Adams is appointed as the responsible individual for the Debtor for purposes of this Chapter 11 Case pursuant to Local Rule 4002-1.
3. Mr. Adams’ contact information is:

William E. Adams
1188 Franklin Street, 4th Floor
San Francisco, CA 94109
Telephone: (415) 775-0533
Email: president@ilwu.org

**** END OF ORDER ****